

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUN 18 2004

Richard H. Milby, Clerk

In re ENRON CORPORATION SECURITIES §
LITIGATION §

This Document Relates To: §

MARK NEWBY, et al., Individually and On §
Behalf of All Others Similarly Situated, §

Plaintiffs, §

vs. §

ENRON CORP., et al., §

Defendants. §

THE REGENTS OF THE UNIVERSITY OF §
CALIFORNIA, et al., Individually and On §
Behalf of All Others Similarly Situated, §

Plaintiffs, §

vs. §

KENNETH L. LAY, et al., §

Defendants. §

01-3624

**UNOPPOSED MOTION OF CIBC DEFENDANTS FOR AN EXTENSION OF TIME
TO RESPOND TO LEAD PLAINTIFFS' MOTION TO COMPEL**

Defendants Canadian Imperial Bank of Commerce and CIBC World Markets Corp.
(collectively "CIBC Defendants") respectfully submit this unopposed motion for an order
extending until June 30, 2004, the time for the CIBC Defendants to file their response to the
Motion to Compel (Docket No. 2183) filed by Lead Plaintiffs on June 2, 2004.

In support of the Unopposed Motion, the CIBC Defendants respectfully show the Court
the following:

2215

1. Counsel for the CIBC Defendants and Lead Plaintiffs have been working together to attempt to resolve by agreement the issues raised in Lead Plaintiffs' Motion to Compel. Those discussions have been productive, but are not yet complete.

2. Counsel for the CIBC Defendants and Lead Plaintiffs have agreed to extend the time for the CIBC Defendants to respond to the Motion to Compel until June 30, 2004.

3. This limited extension is warranted due to the complexity and burdens of the case and will not delay the proceedings, but rather will serve the interests of justice and promote efficiency.

Accordingly, the CIBC Defendants respectfully request that the Court enter the Order submitted with this Unopposed Motion.

Dated: June 18, 2004

Respectfully submitted,



Mark D. Manela

Texas Bar No. 12894500

S.D. Texas I.D. No. 1821

MAYER, BROWN, ROWE & MAW LLP

700 Louisiana Street, Suite 3600

Houston, Texas 77002

Telephone: (713) 221-1651

Telecopier: (713) 224-6410

e-mail: cibc-newby@mayerbrownrowe.com

ATTORNEY IN CHARGE FOR
CANADIAN IMPERIAL BANK OF
COMMERCE, CIBC WORLD MARKETS CORP.
(F/K/A CIBC OPPENHEIMER CORP.)
AND CIBC WORLD MARKETS plc

OF COUNSEL:

Alan N. Salpeter

Michele Odorizzi

T. Mark McLaughlin

MAYER, BROWN, ROWE & MAW LLP

190 South LaSalle Street

Chicago, Illinois 60603

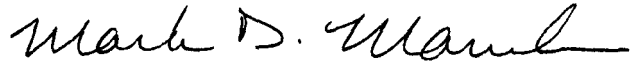
Telephone: (312) 782-0600

Telecopier: (312) 701-7711

e-mail: cibc-newby@mayerbrownrowe.com

CERTIFICATE OF CONFERENCE

The undersigned certifies that he has conferred with Robert R. Henssler, Jr., counsel for Lead Plaintiffs, and he does not oppose this Motion.

A handwritten signature in black ink, reading "Mark D. Manela", written over a horizontal line.

Mark D. Manela

CERTIFICATE OF SERVICE

A true and correct copy of Unopposed Motion of CIBC Defendants for an Extension of Time to Respond to Lead Plaintiffs' Motion to Compel has been served upon all counsel of record via the www.es13624.com website on this the 18th of June, 2004.

A handwritten signature in black ink, appearing to read "Mark D. Manela", written over a horizontal line.

Mark D. Manela